

Docket No. 07-

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY)
d/b/a AmerenCIPS)

Approval of the Energy Efficiency and Demand-Response Plan

COMES NOW CENTRAL ILLINOIS LIGHT COMPANY d/b/a AmerenCILCO, CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS, and ILLINOIS POWER COMPANY d/b/a AmerenIP (the “Ameren Illinois Utilities”), and for their Petition seeking approval of their Energy Efficiency and Demand-Response Plan (“Plan”) pursuant to 220 ILCS 5/12-103(f) of the Public Utilities Act (“PUA”), states as follows:

1. In accordance with recently passed legislation, P.A. 95-0481, the Ameren Illinois Utilities are required to submit an Energy Efficiency and Demand-Response Plan (“Plan”) in the manner prescribed by new Section 12-103 of the PUA. 220 ILCS 5/12-103. Specifically, Section 12-103(f) requires that by no later than November 15, 2007, each electric utility shall file an Energy Efficiency and Demand-Response Plan with the Illinois Commerce Commission (“Commission”) ,to meet the energy efficiency and demand-response standards for 2008 through 2010. Accordingly, on or before November 15, 2007, the Ameren Illinois Utilities will submit their Plan in support of the relief being sought by this Petition.

2. The Plan will identify cost-effective energy efficiency measures to meet the incremental annual energy savings goals identified in Section 12-103(b). Specifically, Section

12-103(b) calls for annual energy savings goals of 0.2% of energy delivered in the year commencing June 1, 2008, 0.4% of energy delivered in the year commencing June 1, 2009, and 0.6% of energy delivered in the year commencing June 1, 2010. The statute also prescribes the incremental annual energy savings goals for later years, through June 1, 2015 and each year thereafter.

3. The Plan will also describe the cost-effective demand-response measures to reduce peak demand by 0.1% over the prior year for “eligible retail customers”, eligible retail customers as defined in Section 16-111.5 of the PUA. Section 12-103(c) requires these demand-response measures commence June 1, 2008 and to continue for ten (10) years thereafter.

4. Notably, the Plan identifies and describes certain critical terms such as “energy-efficiency”, “demand-response”, “electric utility”, and “total resource cost test” as having the same meanings as set forth in the Illinois Power Agency Act. (See Section 1-10 of the Illinois Power Agency Act).

5. The Plan will also be filed in accordance with Section 12-103(e). Specifically, the Ameren Illinois Utilities shall implement 100% of the demand-response measures. Further, the Ameren Illinois Utilities shall implement 75% of the energy efficiency measures approved by the Commission, and the remaining 25% of the energy efficiency measures approved by the Commission shall be implemented by the Department of Commerce and Economic Opportunity.

6. Notwithstanding the requirements of Section 12-103(b) and (c) with respect to the identified targets to be reached with respect to energy efficiency and demand-response measures, the Plan takes into account the provisions set forth in Section 12-103(d), such that the Ameren Illinois Utilities will reduce the amount of energy efficiency and demand-response measures implemented in any single year. The amount of the measures to be reduced is the amount

necessary to limit the estimated average increase paid by retail customers to: (1) in 2008, no more than 0.5% of the amount paid per kilowatt hour by those customers during the year ending May 31, 2007; (2) in 2009, the greater of an additional 0.5% of the amount paid per kilowatt hour by those customers during the year ending May 31, 2008 or 1% of the amount paid per kilowatt hour by those customers during the year ending May 31, 2007; and (3) in 2010, the greater of an additional 0.5% of the amount paid per kilowatt hour by those customers during the year ending May 31, 2009 or 1.5% of the amount paid per kilowatt hour by those customers during the year ending May 31, 2007. The statute also prescribes rate impact limitations for years beyond 2010 but they are not germane with respect to this Plan.

7. In support of the goals and objectives of the Plan, the Ameren Illinois Utilities will also offer a cost recovery mechanism by which to recover the associated costs and expenses with regard to the energy efficiency and demand-response measures to be implemented. Specifically, Section 12-103(e) states, “A utility providing approved energy efficiency and demand-response measures in the state shall be permitted to recover costs of those measures through an automatic adjustment cost tariff filed with and approved by the Commission. The tariff shall be established outside the context of the general rate case. Each year the Commission shall initiate a review to reconcile any amounts collected with the actual costs and to determine the required adjustment to the annual tariff factor to match annual expenditures.” 220 ILCS 5/12-103(e). The tariffs that will be submitted with the November 15, 2007 filing, will include the necessary formulae by which the costs of the aforesaid measures will be recovered and also provide for an annual reconciliation. In addition, as also permitted by Section 12-103(e), the aforesaid automatic adjustment clause tariff will allow for the Ameren Illinois Utilities to recover the costs estimated for the Department of Commerce and Economic Development with regard to

its obligation to demand-response measures to be implemented. Costs to be collected by the Ameren Illinois Utilities for measures implemented by the agency shall be submitted to it pursuant to Section 605-323 of the Civil Administrative Code of Illinois and used in the manner prescribed by statute.

8. In support of the Plan, the Ameren Illinois Utilities will submit certain testimonies and exhibits that will both identify the energy efficiency and demand-response measures to be implemented, and the process by which that implementation will take place. Further, the testimonies and exhibits will also put forth the necessary tariffs that will permit cost recovery in the manner permitted under the new legislation.

9. The Ameren Illinois Utilities are affiliated by virtue of a common parent company, Ameren Corporation. Thus, pursuant to Section 12-103(1)(iii), the Plan to be submitted is as if they were a “single electric utility”.

WHEREFORE, the Ameren Illinois Utilities request that the Commission approve the Plan, the proposed cost recovery tariffs, and for such other and further relief as deemed equitable and just.

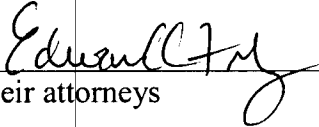
Dated: November 5, 2007

Respectfully submitted,

CENTRAL ILLINOIS LIGHT COMPANY
d/b/a AmerenCILCO,

CENTRAL ILLINOIS PUBLIC SERVICE
COMPANY d/b/a AmerenCIPS, and

ILLINOIS POWER COMPANY
d/b/a AmerenIP

By: 
One of their attorneys


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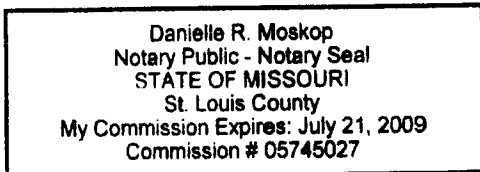
VERIFICATION

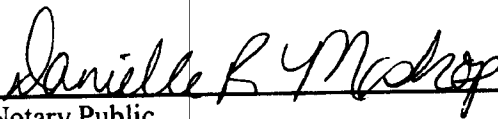
I, Stan E. Ogden, certify that: (i) I am Vice President of Customer Service and Public Relations for the Ameren Illinois Utilities; (ii) I have read the foregoing Petition and attached Exhibits; (iii) I am familiar with the facts stated therein; and (iv) the facts are true and correct to the best of my knowledge.



Stan E. Ogden

SUBSCRIBED and SWORN to before me this 29th day of October, 2007.





Notary Public